

CHALOS, O'CONNOR & DUFFY, LLP  
Attorneys for Plaintiff,  
MARTHA RUSS SHIPPING COMPANY LIMITED  
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Owen F. Duffy (OD-3144)  
George E. Murray (GM-4172)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MARTHA RUSS SHIPPING COMPANY LIMITED,

Plaintiff,

v.

BRANSFORD INTERNATIONAL LIMITED,  
and  
QC GROUP d/b/a  
QC SHIPPING PTE LTD. and  
QC SHIPPING LIMITED and  
QC CONTAINER LINES LIMITED,

Defendants.

-----X  
STATE OF NEW YORK :  
: ss.  
COUNTY OF NASSAU :

08 CV 2847 (HB)

**ATTORNEY'S AFFIDAVIT  
THAT DEFENDANTS  
CANNOT BE FOUND  
WITHIN THE DISTRICT**

This affidavit is executed by the attorney for the Plaintiff, MARTHA RUSS SHIPPING COMPANY LIMITED, (hereinafter "MRS"), in order to secure the issuance of a Summons and Process of Attachment and Garnishment in the above-entitled, *in personam*, Admiralty cause.

Owen F. Duffy, being first duly sworn, deposes and states:

1. I am a partner of the firm of Chalos, O'Connor & Duffy LLP representing Plaintiff MRS in this case.

2. I have personally inquired or have directed inquiries into the presence of Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED in this District.

3. I have personally checked with the office of the Secretary of State of the State of New York, using the Secretary of State's Division of Corporations database, and I have determined that, as of March 18, 2008, the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED are not incorporated pursuant to the laws of New York, are not qualified to conduct business within the State of New York and has not nominated agents for the service of process within New York.

4. The Secretary of State of the State of New York does have listings for "Bransford Inc." and "Bransford Enterprises, Inc." but these entities are listed as inactive and, while there is no reason to believe these companies are related to the Defendant "Bransford International Limited," for Rule B purposes an inactive listing does not establish a presence in the district.

5. The Secretary of State of the State of New York also has a listing for "The Bransford Group, LLC" which is an active entity in Saratoga, New York but further investigation does not show any link to "Bransford International Limited" which does business out of Singapore.

6. The Secretary of State of the State of New York also has a listing for "Q.C. Group, Ltd." but this entity is listed as inactive and, while there is no reason to believe this company is related to the Defendant "QC Group", an entity established in Bangladesh with offices in Singapore that has a web site with no New York office listed, for Rule B purposes an inactive listing does not establish a presence in the district.

7. Furthermore, I have inquired of Verizon Telephone Company whether the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED can be located within this District. The Verizon Telephone Company has advised me that the Defendants do not have any telephone number listings within this District.

5. I have further consulted with several other telephone directories on the internet, and I have found no telephone listing or address for the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED within this District.

6. I have further made several searches on the internet with various search engines and maritime websites, and I have found no indication that the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED can be found within this District.

7. In that I have been able to determine that the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and

QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED are not based in the United States of America and that I have found no indication that the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED can be found within this District, I have formed a good faith belief that the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED do not have sufficient contacts or business activities within this District to defeat maritime attachment under Rule B of the Supplemental Rules for Admiralty and Maritime Claims as set forth in the Federal Rules of Civil Procedure.

8. It is my belief, based upon my own investigation that the Defendants BRANSFORD INTERNATIONAL LIMITED and/or QC GROUP d/b/a QC SHIPPING PTE LTD. and QC SHIPPING LIMITED and QC CONTAINER LINES LIMITED cannot be found within this District for the purposes of Rule B of the Supplemental Rules for Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

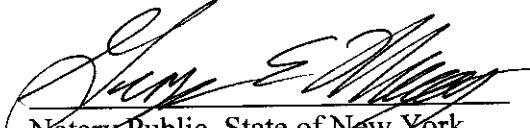
Dated: Port Washington, New York  
March 18, 2008

CHALOS, O'CONNOR & DUFFY, LLP  
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MARTHA RUSS SHIPPING COMPANY  
LIMITED

By: 

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Subscribed and sworn to before me this  
March 18, 2008

  
Notary Public, State of New York

**GEORGE E. MURRAY**  
**Notary Public, State of New York**  
**No. 02MU6108120**  
**Qualified in New York County**  
**Commission Expires April 12, 2008**